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July 12, 2016

VIA CM/ECF and Overnight Mail

Honorable Paul R. Warren
United States Bankruptcy Court Judge
Western District of New York
100 State Street
Rochester, New York 14614

Re: Flour City Bagels, LLC
Chapter 11, Case No. 2-16-20213-PRW

Dear Judge Warren,

This firm represents Michael Borrelli, a 10% owner of HOT, LLC, the Debtor's sole member, and a purported guarantor of the indebtedness owed to the Debtor's senior secured creditor, United Capital Business Lending, Inc., in the above referenced Chapter 11 bankruptcy case.

This letter is being submitted after our consideration of the letter submitted by Mr. Dove on behalf of the Bruegger's entities dated July 11, 2016. In his letter, Mr. Dove requests that the Court approve an extension of the July 15, 2016 deadline for Bruegger's to file its "non-unique" objections to the Debtor's motion to approve the sale of substantially all of its assets to Canal Mezzanine Partners II, LLP pursuant to sections 105 and 363 of the Bankruptcy Code (the "Sale Motion") to July 18, 2016.

Pursuant to the Amended Bidding Procedures Order dated June 7, 2016, the current deadline for Mr. Borrelli to submit an objection to the Sale Motion is July 15, 2016. While Mr. Borrelli has a significant financial interest in this bankruptcy case and the outcome of the Sale Motion, he has limited resources with which to oppose the Sale Motion. Accordingly, by this letter I am requesting that Mr. Borrelli's deadline to object to the Sale Motion be extended to July 19, 2016 so that Mr. Borrelli can have the benefit of considering the objections filed by other interested parties, including Bruegger's, in preparing his own objection to the Sale Motion.

Very truly yours,


Steven W. Wells

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